

**PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Investigation into )  
Implementation of Assembly Bill 970 Regarding) I.00-11-001  
the Identification of Electric Transmission and )  
Distribution Constraints, Actions to Resolve )  
Those Constraints, and Related Matters )  
Affecting the Reliability of Electric Supply. )  
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**STATEMENT OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
CORPORATION ON WORKSHOP REPORT REGARDING TRANSMISSION COSTS  
USED IN RENEWABLE PORTFOLIO STANDARD PROCUREMENTS**

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Dated: April 8, 2005

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Pursuant to the Administrative Law Judge’s (“ALJ”) March 17, 2005, Ruling Allowing for Comments on Workshop Report Regarding Transmission Costs Used in Renewable Portfolio Standard Procurements (“Ruling”), the California Independent System Operator Corporation (“CAISO”) respectfully submits this limited opening statement.

The CAISO appreciates the diligence and thoughtfulness of the Commission staff and interested parties reflected in the Workshop Report. The Workshop Report addresses issues directed both toward the more narrow and immediate goal of enhancing the Transmission Ranking Cost Report process as well the more broad objectives of efficient and effective transmission and generation resource planning. Adequate answers to these issues are critical to the success of the Renewable Portfolio Standard and implicate many of the responsibilities assigned to the CAISO by the Legislature. Consistent with its responsibilities, the CAISO recognizes that it is in a position to assist the Commission in formulating such answers. Regrettably, the CAISO is not able to provide substantive opening comments in accordance with the schedule set forth in the Ruling. Instead, the CAISO intends to accept the ALJ’s invitation to address in reply comments any party’s proposals in light of existing regulatory or legal requirements. (Ruling at p. 2.)

The CAISO recognizes that the existing schedule does not provide parties with the opportunity to respond to reply comments. Accordingly, the CAISO respectfully requests that, to the extent any interested party desires to respond to the CAISO's reply comments, a reasonable opportunity for further comment be provided to those parties. Providing a reasonable opportunity for a additional comment is consistent with the Ruling's suggestion that additional procedural steps will be necessary before a final Commission decision in this matter.

April 8, 2005

Respectfully Submitted:

By: \_\_\_\_\_  
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